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Attorneys for The Roman Catholic Archbishop of San Francisco

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re Case No. 23-30564

THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO,

Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

Date: August 28, 2025
Time: 1:30 p.m.
Location: Via ZoomGov
Judge: Hon. Dennis Montali

**FOURTH INTERIM APPLICATION OF TRANSPERFECT LEGAL SOLUTIONS FOR
ALLOWANCE OF FEES AND REIMBURSEMENT OF EXPENSES AS LITIGATION
AND E-DISCOVERY SUPPORT FOR FEBRUARY 1, 2025
THROUGH AND INCLUDING MAY 31, 2025**

1 TransPerfect Document Management, Inc. and Chancery Staffing Solutions, LLC (dba
2 TransPerfect Staffing Solutions), together known as TransPerfect Legal Solutions (“TransPerfect”
3 or the “Applicant”), litigation support consulting and e-discovery support services provider for the
4 debtor and debtor in possession, The Roman Catholic Archbishop of San Francisco, (“RCASF” or
5 the “Debtor”), submits this application (the “Application”) for interim allowance of fees and
6 reimbursement of expenses for the four-month period of February 1, 2025, through and including
7 May 31, 2025 (the “Application Period”) as set forth in the Request for Relief below. In support
8 of this Application, TransPerfect relies on this Application, the *Declaration of David Brill* (“Brill
9 Dec.”) filed in support of this Application, the *Declaration of Fr. Patrick Summerhays*
10 (“Summerhays Dec.”) in support of this Application, the pleadings and papers on file in this case,
11 and on such other evidence and argument as may be submitted before or during the hearing on this
12 Application.

I.

RELIEF REQUESTED

15 Through this Application, TransPerfect requests an Order:

16 1. Approving on an interim basis TransPerfect's fees in the amount of \$20,964.74 and
17 reimbursement of expenses in the amount of \$632.50 for a total of \$21,597.24 incurred from
18 February 1, 2025 through and including May 31, 2025.

19 2. Authorizing payment to TransPerfect by the Debtor of the unpaid balance of the
20 allowed fees and expenses; and

21 || 3. For such other relief as the Court deems just and proper.

II.

BACKGROUND FACTS

24 On August 21, 2023, the Debtor filed a voluntary Chapter 11 Bankruptcy Petition (“Petition
25 Date”). The Debtor remains in possession of its estate, no trustee having been appointed. The
26 Debtor is operating and managing its business as a debtor in possession pursuant to the provisions
27 of Sections 1107 and 1108 of the Bankruptcy Code. On September 1, 2023, the Office of the

28 | //

1 United States Trustee appointed an Official Committee of Unsecured Creditors (the “Committee”)
2 [ECF No. 58].

3 A description of the Debtor’s history, business operations, operational structure, the
4 reasons for commencing the Chapter 11 Case, the relief sought from the Court, and the facts and
5 circumstances supporting this Application are set forth in the *Declaration of Joseph J. Passarello*
6 *in support of Chapter 11 Petition and First Day Motions* filed on August 21, 2023, at ECF No. 14
7 (“Passarello Background Dec.”), and the *Declaration of Paul E. Gaspari in Support of Chapter 11*
8 *Petition and First Day Motions* filed on August 21, 2023 at ECF No. 15 (“Gaspari Dec.”).

9 On February 12, 2024, the Court entered its order granting the Debtor's application to
10 employ TransPerfect as provider of litigation support consulting and e-discovery support services,
11 effective as of December 21, 2023 [ECF No. 468].

III.

STATUS OF CASE

14 To avoid unnecessary duplication, the case status is set forth in the *Fifth Interim Application*
15 of *Felderstein Fitzgerald Willoughby Pascuzzi & Rios LLP for Allowance of Fees and*
16 *Reimbursement of Expenses as Counsel for Debtor in Possession* and incorporated herein by this
17 reference.

IV.

SERVICES RENDERED

20 The services performed by TransPerfect in this case have been categorized into task billing
21 categories. Detailed billing statements reflecting TransPerfect's time records and out of pocket
22 expenses, including a summary of the aggregate and itemized hours and total compensation
23 requested with respect to the professionals who provided compensable services are attached to the
24 Brill Dec. as ***Exhibit A***. The billing statements are organized by task, and the content of the billings
25 included in each task is generally explained in Paragraph 11 of the Brill Dec. and below.

26 TransPerfect has worked closely with the Debtor and attorneys from Sheppard Mullin,
27 Richter & Hampton LLP (“Sheppard Mullin”), co-counsel to the Debtor, to respond fully and
28 appropriately to the Committee’s discovery requests.

1 Specifically, TransPerfect has worked with the Debtor and Sheppard Mullin to ensure
2 appropriate and fulsome collection, and as appropriate hosting, of data; aided Sheppard Mullin
3 attorneys with their respective review and analysis of the data collected; and provided e-discovery
4 support related to production and export of appropriate and relevant documents to the Committee
5 and Insurers. The Debtor has required these services to ensure the efficient administration of this
6 Bankruptcy Case, including, but not limited to prompt responses to discovery requested by the
7 Committee, the Insurers and other parties in interest, all in furtherance of preparation and
8 participation in mediation and a prompt and consensual resolution of the Bankruptcy Case, if
9 possible.

10 A listing of the billing task categories showing the number of professional hours expended
11 and fees incurred under each billing task category is shown below:

CATEGORY	QUANTITY/UNITS	AMOUNT
Digital Reef Hosting – Adv ECA	1,256.20	\$2,512.40
Monthly Storage Fees	654.00	\$3,924.00
Monthly User Access Fee	10.00	\$750.00
Project Management	30.30	\$5,302.50
Technical Labor	3.00	\$525.00
Production	10.00	\$2,500.00
Senior Project Management Time	0.80	\$220.00
Computer/Server Collection	2.25	\$618.75
Forensic Consulting	0.25	\$93.75
Hourly – Standard	11.50	\$3,622.50
Color Imaging	1.00	\$895.84
Totals	1,979.30	\$20,964.74

1 A breakdown of the professionals who billed time and the number of hours billed by each
2 is as follows:

3 Professional	4 Hourly Rate	5 Hours Billed	6 Total
7 Raymond Kim	8 \$175	9 10.70	10 \$1,872.50
11 Felix Lin	12 \$175	13 0.80	14 \$140.00
15 Mohammed Hassnain	16 \$175	17 2.50	18 \$437.50
19 Erina Lee	20 \$175	21 2.00	22 \$350.00
23 Matthew Sherman	24 \$175	25 3.10	26 \$542.50
27 Emily Hong	28 \$175	29 3.60	30 \$630.00
31 Ben Goldberg	32 \$175	33 4.80	34 \$840.00
35 Bhishma Desai	36 \$175	37 2.00	38 \$350.00
39 Ricardo Morales	40 \$175	41 0.80	42 \$140.00
43 Totals		44 30.30	45 \$5,302.50

12 The expenses incurred during the period covered by this Application are as follows:

13 Category	14 Total
15 Flash Drive – 64 GB	16 \$70.00
17 Expenses	18 \$97.50
19 Storage Drive Set – 2 TB	20 \$380.00
21 Remote Kit Rental Fee – Domestic	22 \$85.00
23 Total Expenses	24 \$632.50

19 **V.**

20 **SUMMARY OF FEES AND EXPENSES**

21 Detailed billing statements reflecting TransPerfect's time records and out of pocket
22 expenses attached as *Exhibit A* to the Brill Dec. in support of this Application reflects total fees in
23 the amount of \$20,964.74 and expenses in the amount of \$632.50 for a total of \$21,597.24, incurred
24 during the Application Period of February 1, 2025, through and including May 31, 2025 together
25 with two invoices from prior time periods¹. TransPerfect requests an order under Bankruptcy Code

26 ¹ After reviewing records, it was determined that a February 2024 Invoice No. 252990 in the
27 amount of \$4,012.34 and May 2024 Invoice No. 257484 in the amount of \$895.84 were not
28 previously noticed in any prior fee application. Therefore, these two prior invoices were included
with the May 2025 Monthly Professional Fee Statement and are part of the fees and costs requested
by this Motion for the Application Period.

1 section 330 approving payment of these fees and expenses as reasonable and necessary for the
2 administration of this case.

3 **VI.**

4 **PAYMENTS RECEIVED TO DATE; AVAILABILITY OF FUNDS**

5 With respect to the Bankruptcy Rule 2016(a) requirements for fee applications,
6 TransPerfect has not received any payments to date in this case from any source, other than the
7 Debtor. The Debtor did not provide TransPerfect with any retainer to cover the fees and expenses
8 incurred by TransPerfect during the Application Period. Except as provided under the
9 Compensation Procedures Order, TransPerfect has neither requested nor received any payments
10 from the Debtor for the Application Period Services.

11 The Court approved on an interim basis TransPerfect's First Interim Fee Application in the
12 amount of \$19,249.32 [ECF No. 828]. The Court approved on an interim basis TransPerfect's
13 Second Interim Fee Application in the amount of \$48,297.13 [ECF No. 947]. The Debtor has paid
14 TransPerfect for the approved fees and costs. The Court approved on an interim basis
15 TransPerfect's Third Interim Fee Application in the amount of \$11,316.38 (\$2,065.00 in fees and
16 expenses in the amount of \$9,251.38) [ECF No. 1172].

17 Pursuant to the *Order Establishing Procedures and Authorizing Payment of Professional*
18 *Fees and Expenses on a Monthly Basis* [ECF No. 212], TransPerfect has filed and served fee notices
19 for February 2025 [ECF No. 1101], March 2025 [ECF No. 1149], April 2025 [ECF No. 1196] May
20 2025 [ECF No. 1223]. No objections were received with respect to the February through May
21 notices. TransPerfect has received payments in the amount of \$9,962.64 from the Debtor, such that
22 it has been paid 80% of fees and 100% of expenses with respect to the February, March and April
23 fee notices. TransPerfect has not received payments for May 2025. The unpaid 20% holdback
24 together with the May 2025 fees and costs total \$11,634.60. The retainer balance as of May 31,
25 2025, was \$0.00.

26 With respect to Bankruptcy Rule 2016(b), TransPerfect has not entered into any agreement,
27 express or implied, with any other party-in-interest, including the Debtor, any creditors, or any
28 representative of them, or with any attorney or accountant for such party-in-interest for the purpose

1 of fixing fees or other compensation to be paid for services rendered or expenses incurred in
2 connection with this case, and no agreement or understanding exists between TransPerfect and any
3 other person for the sharing of the compensation to be received for services rendered in, or in
4 connection with, this case.

5 **IX.**

6 **CONCLUSION**

7 Based on all of the above, TransPerfect respectfully requests that this Court enter an order
8 granting the relief requested herein, and for such other and further relief as the Court deems
9 necessary and proper.

10 Dated: July 8, 2025

TRANSUPERFECT LEGAL SOLUTIONS

11 By:


12 David Brill
13 Director

14 Dated: July 10, 2025

15 FELDERSTEIN FITZGERALD WILLOUGHBY
16 PASCUZZI & RIOS LLP

17 By:

/s/ Jason E. Rios
18 Paul J. Pascuzzi
19 Jason E. Rios
Thomas R. Phinney
Mikayla E. Kutsuris
20 Attorneys for The Roman Catholic
Archbishop of San Francisco

21 Dated: July 10, 2025

22 SHEPPARD, MULLIN, RICHTER & HAMPTON
23 LLP

24 By:

/s/ Ori Katz
25 Ori Katz
26 Alan H. Martin
27 Attorneys for The Roman Catholic
28 Archbishop of San Francisco

CASE NO. 23-30564
TRANSUPERFECT 4TH INTERIM APPLICATION